

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

DENNIS OWEN COLLINS, et al.,

Defendants.

Criminal No. 1:13-cr-383

Hon. Liam O'Grady

**GOVERNMENT'S OPPOSITION TO  
DEFENDANTS' MOTION TO SET ANOTHER STATUS CONFERENCE**

Despite its reservations, the Court granted the defendants' first motion for a status hearing rather than to set this case for trial as is usually done in the Eastern District of Virginia. A month later, defendants admit that they still have made no progress and that another status conference in the year 2014 "should see them better able to assess the time requirements of an adequate defense." Dkt. No. 97. Because another status conference without agenda (and hence no accountability) would unduly delay the resolution of this case, the government asks the Court to deny the motion and set the case for trial.

First, the government has produced broad, early, and organized discovery to all defendants. The discovery is in electronic form, has been indexed, and is broadly searchable. It has been broken out into documents specific to individual defendants, specific categories of files (such as search warrants, investigative reports, loss figures, and forensic reports), and even contains folders segregating out key evidence forming the basis for overt acts alleged in the indictment.

Second, government counsel has over the past few weeks reached out to every defense attorney in this matter and has in most cases individually met with defense counsel (with the case agent present) to answer questions about discovery, explain the theory of the case, share anticipated and applicable sentencing guidelines, and begin potential plea negotiations. But without a specific trial date to focus on, these discussions may not be as productive.

Having no trial date to work towards may unnecessarily delay any resolution of this case, and so the government asks the Court to deny the defendants' second motion for another status conference next year, and requests that the Court schedule the matter for trial.

Respectfully submitted,

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By: \_\_\_\_\_ /s/

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Date: November 20, 2013

**CERTIFICATE OF SERVICE**

I hereby certify that on November 20, 2013, I electronically filed the foregoing  
GOVERNMENT'S OPPOSITION TO DEFENDANTS' MOTION TO SET  
ANOTHER STATUS CONFERENCE with the Clerk of Court using the CM/ECF  
system, which will send a notification of that electronic filing (NEF) to:

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